

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CROSSROADS SYSTEMS, INC.,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. 1:10-CV-652-SS
v.	§	
	§	JURY DEMANDED
(1) 3PAR, INC.,	§	
(2) AMERICAN MEGATRENDS, INC.,	§	
(3) RORKE DATA, INC.,	§	
(4) D-LINK SYSTEMS, INC.,	§	
(5) CHELSIO COMMUNICATIONS, INC.,	§	
(a Delaware Corporation),	§	
(6) ISTOR NETWORKS, INC., and	§	
(7) CHELSIO COMMUNICATION, INC.,	§	
(a California Corporation),	§	
	§	
Defendants.	§	

**PLAINTIFF CROSSROADS SYSTEMS, INC.'S
OBJECTIONS TO THE REPORT AND RECOMMENDATION
OF THE SPECIAL MASTER**

Plaintiff Crossroads Systems, Inc. ("Crossroads") hereby responds to the Report and Recommendation of the Special Master Regarding U.S. Patent Nos. 7,051,147 and 6,425,035 issued August 10, 2011 (the "Report and Recommendation").

Crossroads does not object to the Special Master's claim constructions set forth in the Report and Recommendation. Crossroads, however, does object to the extent that the constructions set forth in the Stipulated Definitions of Claim Terms (Dkt. No. 117, filed February 22, 2011) and the Supplemental Stipulated Definitions of Claim Terms (Dkt. No. 143, filed April 22, 2011) were not included in the Report and Recommendation. Crossroads respectfully requests that the Court's Claim Construction Order adopt the constructions stipulated to by Crossroads, Rorke Data, Inc. and 3PAR, Inc. for the claim terms "data," "Fibre

Channel,” “Virtual Local Storage,” “Remote,” “Second Transport Medium,” “Map/Mapping,” “Buffer,” “Storage Device(s),” “LUN,” “Virtual LUN(s),” “Virtual Representation,” and “First Transport Medium” and order that the following claim terms do not require construction “Connected to/connects,” “Contained in the Map,” “Representation,” and “Maps from the host device to a virtual representation of at least a portion of the storage space on the storage device to the storage device.” True and correct copies of the Stipulated Definitions of Claim Terms and Supplemental Stipulated Definitions of Claim Terms are attached hereto as Exhibits A and B.

Dated: September 19, 2011

Respectfully submitted,

By: /s/ Elizabeth J. Brown Fore

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of September, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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